

WRIGHT, FINLAY & ZAK, LLP
T. Robert Finlay, Esq., SBN 167280
Kathryn A. Moorner, Esq., SBN 272801
4665 MacArthur Court, Suite 200
Newport Beach, CA 92660
T: (949) 477-5050 / F: (949) 608-9142
Email: kmoorer@wrightlegal.net

Attorneys for Defendant SELENE FINANCE, LP

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

TAMARA REEDER, an individual,

Plaintiffs,

vs.

SELENE FINANCE, LP, a Delaware
limited partnership; and MTC
FINANCIAL, INC., d/b/a TRUSTEE
CORPS, a California corporation,

Defendants.

Case No. 3:23-cv-05986-SK

Assigned to Hon. Rita F. Lin

**REQUEST TO APPEAR VIA ZOOM
OR TELEPHONICALLY AT THE
HEARING ON THE MOTION TO
DISMISS COMPLAINT**

Motion Hearing Date:

Date: April 23, 2024

Time: 10:00 a.m.

Ctrm: 15 – 18th Floor

**TO THIS HONORABLE COURT AND TO ALL PARTIES AND THEIR
ATTORNEYS OF RECORD, IF ANY:**

PLEASE TAKE NOTICE that Kathryn A. Moorner, attorney of record for Defendant SELENE FINANCE, LP (“Defendant”) hereby respectfully requests to appear remotely at the hearing on Defendant’s Motion to Dismiss Complaint, currently set hearing on April 23, 2024, at 10:00 a.m. in Courtroom 15 (18th Floor) of the above-captioned court, located at 450 Golden Gate Avenue, San Francisco, California 94102.

Grounds for requesting to appear remotely are as follows:

1. Ms. Moorer's place of business is located in Orange County, California.
2. It would be more economical for the moving party if the court allows this remote appearance, as appearance via Zoom will avoid travel costs and expenses that would otherwise be incurred for making a personal appearance.

WRIGHT, FINLAY & ZAK, LLP

Dated: April 2, 2024

By:

Kathryn Moorer, Esq.
Attorneys for Defendant SELENE
FINANCE, LP

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 4665 MacArthur Court, Suite 200, Newport Beach, California 92660. I am readily familiar with the practices of Wright, Finlay & Zak, LLP, for collection and processing of correspondence for mailing with the U.S. Postal Service. Such correspondence is deposited with the U.S. Postal Service the same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[X] by placing [] the original [X] a true copy thereof enclosed in sealed envelope(s) addressed as follows:

John C. Steele, Esq.
Tanya C. McCullah, Esq.
17272 Red Hill Avenue
Irvine, California 92614
T: 949-222-1161 / F: 949-221-9500
Email: jsteele@steelellp.com; tmccullah@steelellp.com
Attorneys for Defendant MTC Financial Inc. dba Trustee Corps

☐ (BY FEDERAL EXPRESS - NEXT DAY DELIVERY) I placed true and correct copies thereof enclosed in a package designated by Federal Express with the delivery fees provided for.

PROOF OF SERVICE

1 completion of an electronic filing. The NEF, when e-mailed to the e-mail
2 address of record in the case, shall constitute the proof of service as required by
3 Fed.R.Civ.P.5(b)(2)(E). A copy of the NEF shall be attached to any document
served in the traditional manner upon any party appearing pro se.”

4 [X] (Federal) I declare under penalty of perjury under the laws of the United States
5 of America that the foregoing is true and correct.

6 Executed on April 2, 2024, at Newport Beach, California.

7 Debbi Bosman

8 Debbi Bosman
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28